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**PACIFIC  TELESIS.**  
Group - Washington

**November 23, 1993**

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**William F. Caton**  
**Acting Secretary**  
**Federal Communications Commission**  
**Mail Stop 1170**  
**1919 M Street, N.W., Room 222**  
**Washington, D.C. 20554**

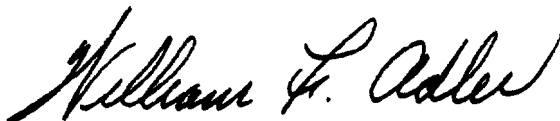
**Dear Mr. Caton:**

**Re: *ET Docket No. 92-9, RM-7981, RM-8004 - Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies***

**On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "*Opposition and Comments on Petitions For Reconsideration and/or Clarification*" in the above proceeding.**

**Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.**

**Sincerely,**



**Enclosures**

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )

Redevelopment of Spectrum to )  
Encourage Innovation in the )  
Use of New Telecommunications )  
Technologies )

ET Docket No. 92-9  
RM-7981  
RM-8004

OPPOSITION AND COMMENTS ON PETITIONS FOR  
RECONSIDERATION AND/OR CLARIFICATION

Pursuant to Rule 1.429(f), Pacific Bell and Nevada Bell hereby submit their opposition and comments on the petitions for reconsideration and/or clarification filed in response to the Second Report and Order ("Order") by Comsearch and Western Tele-Communications, Inc. (WTCI).

6 and 11 GHz Bands

Pacific Bell and Nevada Bell support Comsearch's request for clarification of the requirement for pairing of frequencies as shown in Appendix A of the Order. (Comsearch at 4) Comsearch requests that the frequency pairings not be mandatory. Mandatory adherence to the frequency pairings may result in inefficient use of the spectrum.

The previous rules for the 6 and 11 GHz bands permitted any frequency combination to be used. The Order provides frequency pairing but allows existing licensees to use some channel plans already in effect.

Fixed systems licensed, in operation, or applied for in the 5925-6425, 10,550-10,680, and 10,700-11,700 MHz bands prior to July 15, 1993 are permitted to use channel plans in effect prior to that date, including adding channels under those plans. (Appendix A, page 62)

The existence of both mandatory frequency pairings and previous non-standardized frequency pairing plans in the same spectrum block, will result in situations in which the suggested pairings cannot be used. For example, one of the frequencies may be blocked by carriers already using a different frequency pairing plan. In that case, if the pairing scheme in Appendix A is mandatory, the paired frequency also would be unusable. This would not be an efficient use of the spectrum. Pacific Bell and Nevada Bell agree with Comsearch that the Commission should administer the listed frequency pairings as preferred but not mandatory. (Comsearch at 4)

#### 4 GHz Band

Pacific Bell and Nevada Bell agree with Comsearch and WCTI that, although it declined to modify the channelization plan of the 4 GHz band, the Commission significantly modified the plan currently accepted by the industry. (Comsearch at 5 and WCTI at 7) Adoption of this plan will result in unnecessary expense and increased coordination and interference problems.

For the 4 GHz band, Appendix A of the Order shows a new high-low transmit to receive scheme with a separation of 280 MHz rather than the current universally used interleaved plan with a separation of 20 MHz. Implementation of this plan would require terrestrial carriers to make expensive changes to their equipment arrangements. In addition, it would make it more difficult to minimize interference problems between terrestrial and satellite users. Pacific Bell and Nevada Bell agree with WCTI that the frequency plan for the 4 GHz band should be changed to the current, interleaved frequency plan. (WCTI at 8)

#### 6425-6525 MHz Band

Pacific Bell and Nevada Bell oppose WCTI's proposal that the Local Television Transmission Service (LTTS) band (6425-6525 MHz) be opened up for general use by common carriers. (WCTI at 5) The LTTS band provides for a useful service that will be essentially destroyed if the current restrictions on the band's use are removed.

WCTI claims that this band is lightly used, compared to the past. (WCTI at 5) Pacific Bell and Nevada Bell disagree with this assertion. We continue to use the LTTS band extensively. In fact, Pacific Bell has TV pools in San Francisco and Los Angeles that provide LTTS throughout California for network broadcast and other television service providers. Opening the band for general

use by common carriers would disrupt LTTS service. LTTS does not allow for extensive prior coordination because many LTTS links must be established in a matter of hours to cover natural disasters and late breaking news stories. Potential interference is prevented by simply calling the handful of LTTS providers in the affected area. If non-LTTS service is allowed in the LTTS band, LTTS providers will have to prior coordinate to prevent interference problems. The normal coordination process takes 45 days to complete. Even on an expedited basis, the process would take several days to a week since hundreds of contacts would need to be made to cover the 125 mile radius. This will not only increase costs for LTTS but also introduce an intolerable delay in providing service. Further, if the band is opened for general use by common carriers, it will become saturated in many locales, thus blocking use by LTTS providers. This will be particularly true in metropolitan areas, the very locations where demand for LTTS is highest. Pacific Bell and Nevada Bell oppose WCTI's request that the Commission issue a Further Notice of Proposed Rule Making proposing to

allocate 6425-6525 MHz band for general common carrier use.  
(WCTI at 6)

Respectfully submitted,

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NEVADA BELL



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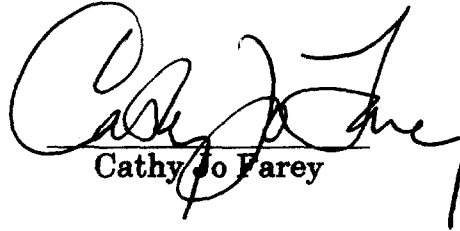
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Their Attorneys

Date: November 23, 1993

# **CERTIFICATE OF SERVICE**

**I, Cathy Jo Farey, hereby certify that a copy of the foregoing Opposition and Comments on Petitions for Reconsideration and/or Clarification was mailed first-class United States mail, postage prepaid, this 23rd day of November, 1993 to the parties listed on the attached service list.**

  
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